

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

_____)
Boston Gas Company)
d/b/a KeySpan Energy Delivery New England)
_____)

D.T.E. 03-40

**PETITION FOR LIMITED PARTICIPANT STATUS OF
THE ENERGY CONSORTIUM**

Pursuant to 220 C.M.R. 1.03, The Energy Consortium ("TEC") hereby petitions the Department of Telecommunications and Energy ("Department") for leave to participate as a limited participant in the above-captioned proceeding. In support of its request, TEC states the following:

1. TEC is a non-profit Massachusetts association located at 24 Hastings Road, Lexington, MA 02421-6807.
2. TEC has represented large commercial and industrial energy users in Massachusetts regulatory matters for over 31 years. It advocates positions that promote responsible use and reliable energy delivery at fair and reasonable rates for its members and all Massachusetts ratepayers. TEC has been a participant in various gas regulatory matters.
3. In conducting adjudicatory hearings, the Department "may allow any person showing that he may be substantially and specifically affected by the proceeding to intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any other limited purpose," as the Department may order. G.L. c. 30A, § 10(4); 220 C.M.R. § 1.03(1)(b).
4. TEC has several members who are customers of Boston Gas/KeySpan. TEC believes the interest of its members will be substantially and specifically affected by this proceeding. TEC feels that proper resolution of Boston Gas's proposed rate increase is important to our members as well as other gas customers who are facing significant economic pressure in the Boston Gas distribution area.
5. TEC's interests are unique and can not be adequately represented by any other party.
6. TEC seeks to participate as a limited participant in this case, and where appropriate, to file comments, attend and participate in technical conferences, submit briefs, and to participate in this proceeding in any other manner deemed appropriate for limited participants by the Hearing Officer.

WHEREFORE, TEC respectfully requests that the Department grant its Petition for Limited Participant status.

Respectfully submitted,

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Dated: June 11, 2003